

California Environmental Protection Agency Department of Toxic Substances Control

HAZARDOUS WASTE FACILITY PERMIT

Facility Name: Raytheon Company 2000 E. El Segundo Boulevard El Segundo, California 90245

Owner Name: Raytheon Company 870 Winter Street Waltham, Massachusetts 02451-1449

Operator Name: Raytheon Company 2000 E. El Segundo Boulevard El Segundo, California 90245 Permit Number: 07-GLN-11

Facility EPA ID Number: CAD000633230

Effective Date: October 9, 2007

Expiration Date: October 8, 2017

Permit Modification History: N/A

Pursuant to California Health and Safety Code section 25200, this Resource Conservation and Recovery Act (RCRA)-equivalent Hazardous Waste Facility Permit is hereby issued to: Raytheon Company

The Issuance of this Permit is subject to the terms and conditions set forth in Attachment A and the Part "B" Application (Operation Plan) dated July 31, 2006. The Attachment A consists of 16 pages including Figures 1 and 2.

Original signed by

Raymond Leclerc, P.E., Leader Permitting Renewal Team Department of Toxic Substances Control

Raytheon Company 2000 E. El Segundo Boulevard El Segundo, California 90245 EPA ID Number: CAD 000633230

HAZARDOUS WASTE FACILITY PERMIT

ATTACHMENT "A"

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PART I. DEFINITIONS

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

- 1. "DTSC" as used in this Permit means the California Department of Toxic Substances Control.
- 2. "Facility" as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

- 3. "Permittee" as used in this Permit means the Owner and Operator.
- 4. "RCRA" as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

Owner of Facility Raytheon Company 870 Winter Street Waltham, Massachusetts 02451-1449

Owner of Real Property Raytheon Company 870 Winter Street Waltham, Massachusetts 02451-1449

3. Operator of Facility Raytheon Company 2000 E. El Segundo Boulevard El Segundo, California 90245

4. <u>Location</u>

The Raytheon Company Facility (Facility) is located at 2000 East El Segundo Boulevard, in the City of El Segundo, County of Los Angeles.

The Facility is on an approximately 134-acre parcel of land zoned for commercial/manufacturing uses. It is bordered on the west by Sepulveda Boulevard and on the opposite side of Sepulveda with Chevron Refinery Inc.; on the east by the Metro Blue-Line rail- track; on the north by El Segundo Boulevard; and on the south by Hughes Way on which is Allied Chemical Corporation. It is approximately 1 mile south of the Los Angeles International Airport. Figure 1 provides the facility location map.

The Facility is located at Latitude 33⁰54'55" North, Longitude 118⁰ 23'20" West, in Section 18, Township 3 South, Range 14 West (San Bernardino Base Line Meridian). The Assessor's parcel numbers are: Book 4138, Page 13, Parcels 22, 23, 24, 25; page 14, Parcels 4, 5, 6.

5. <u>Description of Facility Operations</u>

The Facility is a manufacturer and assembler of electronic components and accessories. Raytheon is also a registered Hazardous Waste Transporter (Transporter Registration No.: 3812 which expires on February 28, 2007).

The Facility stores wastes generated onsite and by it's satellite facilities. These wastes include plating wastes, spent halogenated and non-halogenated solvents, magnesium turnings, cutting fluids, waste water treatment sludge, ethylene glycol, petroleum waste oils, alkaline wastes, acidic wastes,

miscellaneous laboratory wastes and retrograde chemicals. The satellite facilities are located within a 160-mile radius of the Facility.

These hazardous wastes are accumulated and stored in 55-gallon or less drums/containers for more than ninety (90) calendar days and less than one year before they are shipped out to other permitted facilities for further treatment and disposal.

The hazardous waste management activities include transportation, transfer, storage, and consolidation of RCRA and non-RCRA hazardous wastes and materials. In-addition, the Facility conducts activities that do not require a Hazardous Waste Facility Permit from DTSC. These activities, performed under related local authority regulations, are: (1) 10-day Transfer Universal Waste Handling, (2) Storage of Hazardous Materials; and, (3) Satellite Accumulation/ 90-day Accumulation activities.

6. <u>Facility History</u>

Hughes Aircraft Company started its operation on May 15, 1979, and was originally granted a five-year Hazardous Waste Facility Permit (Permit) in June 1985 by the California Department of Health Services (now the Department of Toxic Substances Control or DTSC) for storing hazardous wastes at the HWMU, under the name of Hughes Aircraft Company, Electro-Optical and Data Systems Group (Hughes-EDSG).

Before the permit expired in June 1990, Hughes submitted a permit renewal application and was subsequently granted a 10-year permit under the name of Hughes-EOS in December 1996. Hughes-EOS had its name changed to Raytheon Company after a business transaction in 1997. This permit expired on January 27, 2007.

On July 31, 2006, Raytheon submitted a permit renewal to continue the operation of hazardous waste storage activity before the permit expiration date.

7. Facility Size and Type for Fee Purposes

The Facility is categorized as **SMALL STORAGE** facility pursuant to Health and Safety Code section 25205.1 and for purposes of Health and Safety Code sections 25205.2 and 25205.19.

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The Part "A" Application, dated July 31, 2006, the Part "B" Application (Operation Plan), dated July 31, 2006, and the "Closure Plan", dated June 19, 2006, are hereby made a part of this Permit by reference.

2. EFFECT OF PERMIT

- (a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to store and transfer Raytheon generated hazardous wastes within a 160-mile radium of the Facility in accordance with the terms and conditions of this Permit. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.
- (f) Failure to submit any information required in connection with the Permit,

- or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).
- (g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. <u>COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT</u> (CEQA)

A Notice of Exemption has been prepared in the accordance with the requirements of Public Resources Code Section 21000 et seq. and the CEQA Guidelines, Section 15070 et seq. of Title 14, California Code of Regulations.]

4. <u>ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION</u> <u>CERTIFICATION</u>

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

5. ACCESS

DTSC, its contractors, employees, agents, and/or any United State Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all

sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

(b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes operation only of the facility units and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous waste in any unit other than those specified in this Part IV. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

UNIT NAME:

Hazardous Waste Storage Area, E-21a;

LOCATION:

The HWMU is located at the southwest corner of the site and northwest of the Hazardous Waste Administrative Building, designated as E-21. Figure 2 provides the unit layout information.

ACTIVITY TYPE:

Storage in containers and waste consolidation.

ACTIVITY DESCRIPTION:

This unit is used to store and consolidate hazardous waste generated onsite and from Raytheon satellite facilities within a 160-mile radius of the Facility. The wastes are stored in 55-gallon or less drums.

PHYSICAL DESCRIPTION:

The HWMU comprises the east and west yard with total area of approximately 3,300 square feet. The east yard is a rectangular concrete storage structure having dimensions of approximately 70 feet by 30 feet. The west yard has the same structure with dimensions of 60 feet by 21 feet. The floor is constructed of a 6-12 inch thick, solvent-resistant epoxy coated reinforced concrete level slab with ramps to allow forklift traffic between the storage and other operational areas. The HWMU has a roof which protects it from precipitation.

MAXIMUM CAPACITY:

30,190 gallons, approximately five hundred and forty-eight (548) 55-gallon drums.

WASTE SOURCES:

The Facility stores wastes generated by Raytheon and its satellite facilities. These satellite facilities are located within 160 miles radius of the Raytheon Facility.

WASTE TYPES:

Wastes include ignitables, corrosives, reactives, plating wastes, spent halogenated and non-halogenated solvents, magnesium turnings, cutting fluids, waste water treatment sludge, ethylene glycol, petroleum waste oils, alkaline wastes, acidic wastes, miscellaneous laboratory wastes, retrograde chemicals, and a variety of non-RCRA (California-regulated) wastes, including oil and petroleum-contaminated wastes generated from Raytheon and its satellite facilities. Constituents of wastes received and stored may include arsenic, barium, cadmium, chromium, chromium, lead, mercury, selenium, silver, benzene, chlorobenzene, chloroform, o-cresol, m-cresol, p-cresol, cresol, methyl ethyl ketone (MEK), pyridine, tetrachloroethylene, trichloroethylene, halogenated and non-halogenated solvents, flammable solids, hazardous solids, non-regulated latex paint, non-regulated coolants, non-regulated solids, non-regulated oils, fuel blend, hazardous waste water, household hazardous waste, and universal wastes.

RCRA HAZARDOUS WASTE CODES:

D		P				
D001	(ignitable)	P030	(cyanides, soluble cyanide			
			salts)			
D002	(corrosion)	P065	(mercury fulminate)			
D003	(reactive)	P074	(nickel cyanide)			
D004	(arsenic)	P098	(potassium cyanide)			
D005	(barium)	P106	(sodium cyanide)			
D006	(cadmium)		U			
D007	(chromium)	U002	(acetone)			
D008	(lead)	U003	(acetonitrile)			
D009	mercury)	U019	(benzene)			
D010	(selenium)	U031	(1-butanol)			
D011	(silver)	U035	(benzenebutanoic acid)			
D015	(toxaphene)	U056	(cyclohexane)			
D035	(methyl ethyl ketone)	U057	(cyclohexanone)			
F		U080	(methylene chloride)			
F001	(spent halogenated solvents used in degreasing)	U122	(formaldehyde)			
F002	(spent halogenated solvents)	U125	(2-furancarboxaldehyde)			
F003	(spent non-halogenated	U140	(isobutyl alcohol)			
	solvents)		,			
F004	(spent solvents)	U144	(lead acetate)			
F005	(spent non-halogenated	U154	(methanol)			
	solvents)					
F006	(wastewater treatment	U159	(methyl ethyl ketone)			

.

	sludges from electroplating)		
F007	(spent cyanide plating bath solutions from electroplating operations)	U161	(methyl isobutyl ketone)
F008	(plating bath residues)	U188	(phenol))
F027	(discarded unused formulations derived from chlorophenols)	U196	(pyridine)
		U211	(tetrachloromethane)
		U213	(tetrahydrofuran)
		U220	(toluene),
		U223	(toluene diisocyanate)
		U226	(1,1,1 -trichloroethane)
		U239	(xylene)

CALIFORNIA HAZARDOUS WASTE CODES:

121	(dichloromethylether,bis[chloromethyl] ether, BCME, bismuth)			
123	(bis[methylmercuric]sulfate, ceresan, liquid, bismuth chromate)			
141	(Off-specification, aged, or surplus in-organics)			
151	(cadmium chloride)			
171	(calcium oxide, lime)			
172	(calcium permanganate)			
181	(other inorganic solid waste, chloral hydrate)			
211	(halogenated solvents, cobalt resinate)			
212	(oxygenated solvents, cobalt sulfate)			
213	(hydrocarbon solvents, cocculus, fishberry, picrotoxin)			
214	(unspecified solvent mixtures)			
221	(waste oil and mixed oil)			
223	(unspecified oil-containing waste)			
252	(other still bottom waste)			
271	(diethyldichlorosilane)			
281	(adhesives)			
331	(off-specification, aged, or surplus organics)			
341	(organic liquids (non-solvents) with halogens			
342	(organic liquids with metals)			
343	(unspecified organic liquid mixture),			
352	(other organic solids)			
461	(paint sludge)			

UNIT SPECIFIC SPECIAL CONDITIONS:

- 1. The Permittee shall include the volume of household and/or universal wastes stored in this unit as part of the maximum permitted storage capacity for this unit.
- 2. The Permittee shall store all drums on pallets with four 55-gallon drums per pallet and in rows stacked no higher than two-pallets high.
- 3. The Permittee shall maintain an aisle space of 8 feet along the length of the storage area and of 4 feet along the width of the storage area.
- 4. The Permittee shall decontaminate pallets used for the hazardous waste storage during the closure activities and characterize the pallets according to the requirements in California Code of Regulations, title 22, chapter 12.

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

PART V. SPECIAL CONDITIONS

- 1. The Permittee shall conduct all loading/unloading activities within an area with secondary containment. The containment system shall have a base which is free of cracks or gaps and is sufficiently impervious to the waste stored and shall be designed and constructed so that any spills can be contained.
- 2. The Permittee shall within ninety (90) calendar days of the effective date of this Permit, revise Section 14.1 [Soil Cleanup Standards] of the "Closure Plan", dated June 19, 2006, to indicate that twelve (12) samples shall be obtained from twelve (12) separate locations in order to establish background for metals (except hexavalent chrome) rather than six (6) samples from two (2) locations.
- 3. The Permittee shall within ninety (90) calendar days of the effective date of this Permit, revise Section 14.1 [Soil Cleanup Standards] of the "Closure Plan", dated June 19, 2006, to indicate that if it is not possible to achieve non-detect or background concentrations being used by the Permittee as closure performance standards, the Permittee shall submit a permit modification request,in accordance with California Code of Regulations, title 22, section 66264.42, to amend the closure plan by changing the background and non-detect closure performance standards to health-based closure performance standards. In that event, the Permittee shall submit a Health-risk Assessment (HRA) Workplan to DTSC, receive written approval to perform the HRA, and submit the results of the HRA as part of the requested permit modification.

PART VI. CORRECTIVE ACTION

- 1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. Corrective action shall be carried out under a corrective action consent agreement to be issued within 180 days after the permit is in effect.
- 2. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.
- 3. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.
- 4. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
- 5. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete

work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.

6. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

FIGURE I: FACILITY LOCATION MAP:

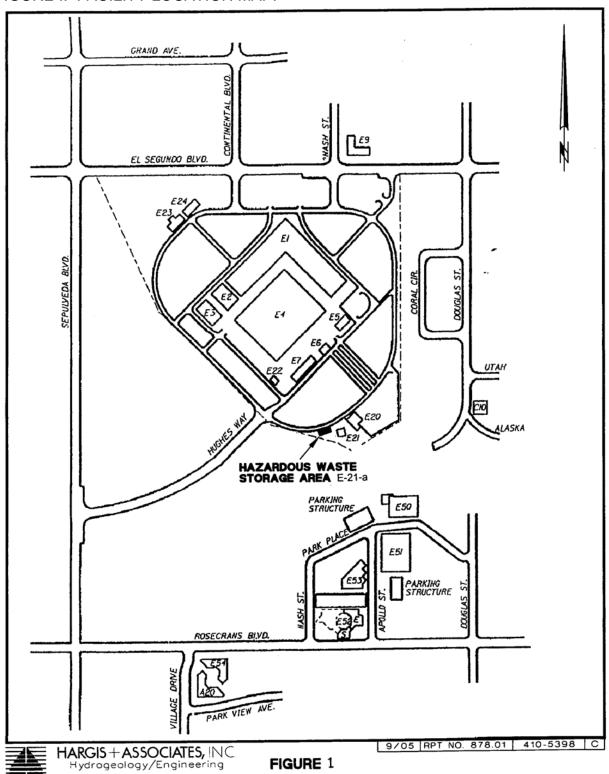


FIGURE 1 FACILITY MAP RAYTHEON COMPANY

FIGURE II: FACILITY LAYOUT

